

Shalom Law

Ortega v. Yagudayev; Case No.: 1:21-cv-1125 (HG) (CLP)

Date	Description	Time	Rate	Amount
2/25/2021	Draft complaint	0.6	\$ 300.00	\$ 180.00
2/26/2021	Draft complaint	0.4	\$ 300.00	\$ 120.00
2/28/2021	Draft complaint	0.5	\$ 300.00	\$ 150.00
3/30/2021	Calendar deadlines	0.1	\$ 300.00	\$ 30.00
3/30/2021	Review Defendants pleadings, strategy for response	0.5	\$ 300.00	\$ 150.00
3/31/2021	Draft Rule 11 safe harbor notice; correspondence with opposing counsel	1.2	\$ 300.00	\$ 360.00
4/2/2021	Calendar deadlines	0.1	\$ 300.00	\$ 30.00
4/5/2021	Calendar conference	0.1	\$ 300.00	\$ 30.00
4/8/2021	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
4/14/2021	Review calendared deadlines	0.1	\$ 300.00	\$ 30.00
4/16/2021	Review notice of voluntary dismissal	0.1	\$ 300.00	\$ 30.00
4/20/2021	Review Order dismissing parties	0.1	\$ 300.00	\$ 30.00
4/25/2021	Strategize regarding case	0.2	\$ 300.00	\$ 60.00
6/1/2021	Correspondence with counsel for Trofimchuck	0.1	\$ 300.00	\$ 30.00
6/10/2021	Correspondence with counsel for Trofimchuck	0.1	\$ 300.00	\$ 30.00
6/16/2021	Prepare scheduling Order; correspondence with opposing counsel	0.5	\$ 300.00	\$ 150.00
6/17/2021	Correspondence with counsel for Trofimchuck	0.1	\$ 300.00	\$ 30.00
6/21/2021	Correspondence with opposing counsel regarding scheduling Order	0.1	\$ 300.00	\$ 30.00
6/22/2021	Calendar deadlines	0.1	\$ 300.00	\$ 30.00
6/23/2021	Conduct initial conference; calendar deadlines; prepare discovery	0.5	\$ 300.00	\$ 150.00
6/24/2021	Calendar conference	0.1	\$ 300.00	\$ 30.00
6/30/2021	Calendar deadlines	0.1	\$ 300.00	\$ 30.00
7/7/2021	Prepare and file notice of voluntary dismissal; calendar deadlines	0.3	\$ 300.00	\$ 90.00
7/13/2021	Draft initial disclosures; correspondence with opposing counsel	0.4	\$ 300.00	\$ 120.00
7/29/2021	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
8/5/2021	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
8/6/2021	Draft discovery demands	0.9	\$ 300.00	\$ 270.00
8/7/2021	Draft responses to discovery demands	1.6	\$ 300.00	\$ 480.00
8/7/2021	Review calendared deadlines	0.1	\$ 300.00	\$ 30.00
8/9/2021	Review calendared deadlines; correspondence with opposing counsel	0.1	\$ 300.00	\$ 30.00
8/25/2021	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
8/26/2021	Correspondence with client	0.2	\$ 300.00	\$ 60.00
8/27/2021	Correspondence with client	0.2	\$ 300.00	\$ 60.00
8/29/2021	Correspondence with client	0.1	\$ 300.00	\$ 30.00
8/31/2021	Correspondence with opposing counsel	0.1	\$ 300.00	\$ 30.00
9/1/2021	Attention to discovery	0.2	\$ 300.00	\$ 60.00
9/2/2021	Attention to discovery	0.3	\$ 300.00	\$ 90.00
9/6/2021	Attention to discovery	0.5	\$ 300.00	\$ 150.00
9/8/2021	Review USDJ Order regarding Defendants' pre-motion application	0.1	\$ 300.00	\$ 30.00

9/9/2021	Review pre-motion application	0.2	\$ 300.00	\$ 60.00
9/10/2021	Review Order adjourning status conference; correspondence with counsel	0.1	\$ 300.00	\$ 30.00
9/13/2021	Correspondence with opposing counsel	0.1	\$ 300.00	\$ 30.00
9/14/2021	Calendar conference	0.1	\$ 300.00	\$ 30.00
9/15/2021	Draft letter response to pre-motion application; file same	0.8	\$ 300.00	\$ 240.00
9/17/2021	Correspondence with opposing counsel	0.1	\$ 300.00	\$ 30.00
9/27/2021	Attention to discovery	0.3	\$ 300.00	\$ 90.00
9/29/2021	Attention to discovery	0.4	\$ 300.00	\$ 120.00
10/4/2021	Attention to discovery	0.2	\$ 300.00	\$ 60.00
10/7/2021	Correspondence with opposing counsel	0.1	\$ 300.00	\$ 30.00
10/13/2021	Calendar deadline	0.1	\$ 300.00	\$ 30.00
10/21/2021	Calendar deadline	0.1	\$ 300.00	\$ 30.00
10/26/2021	Calendar conference	0.1	\$ 300.00	\$ 30.00
10/31/2021	Draft letter mtoion fo rextension of time to complete discovery	0.3	\$ 300.00	\$ 90.00
11/1/2024	Calendar deadlines	0.1	\$ 300.00	\$ 30.00
11/2/2021	Attend pre-motion conference	0.4	\$ 300.00	\$ 120.00
11/3/2021	Calendar deadlines	0.1	\$ 300.00	\$ 30.00
11/9/2021	Draft amended complaint	0.3	\$ 300.00	\$ 90.00
11/14/2021	Calendar deadline	0.1	\$ 300.00	\$ 30.00
11/15/2021	Correspondence with opposing counsel	0.1	\$ 300.00	\$ 30.00
11/16/2021	Calendar deadline	0.1	\$ 300.00	\$ 30.00
11/22/2021	Review, revise, and finalize amended complaint; calendar deadlines	1.4	\$ 300.00	\$ 420.00
11/23/2021	Draft and file motion for leave to correct; review Order	0.3	\$ 300.00	\$ 90.00
12/5/2021	Calendar deadline; correspondence with opposing counsel	0.1	\$ 300.00	\$ 30.00
12/7/2021	Review Defendants letter motion for extension of time	0.1	\$ 300.00	\$ 30.00
12/8/2021	Review Court Order granting Defendants' letter motion	0.1	\$ 300.00	\$ 30.00
12/10/2021	Review answer filed by Defendants	0.2	\$ 300.00	\$ 60.00
12/23/2021	Correspondence with opposing counsel	0.1	\$ 300.00	\$ 30.00
12/27/2021	Calendar deadline	0.1	\$ 300.00	\$ 30.00
1/10/2022	Draft discovery demands	0.8	\$ 300.00	\$ 240.00
1/14/2022	Revise discovery demands	0.5	\$ 300.00	\$ 150.00
1/16/2022	Calendar deadlines	0.1	\$ 300.00	\$ 30.00
1/17/2022	Draft discovery demands; correspondence with opposing counsel	0.5	\$ 300.00	\$ 150.00
1/19/2022	Correspondence with opposing counsel	0.1	\$ 300.00	\$ 30.00
1/20/2022	Calendar deadline; correspondence with client regarding discovery	0.1	\$ 300.00	\$ 30.00
1/27/2022	Correspondence with client regarding discovery	0.1	\$ 300.00	\$ 30.00
1/31/2022	Correspondence with opposing counsel	0.1	\$ 300.00	\$ 30.00
2/3/2022	Correspondence with client regarding discovery	0.1	\$ 300.00	\$ 30.00
2/7/2022	Correspondence with opposing counsel	0.2	\$ 300.00	\$ 60.00
2/10/2022	Calendar deadline	0.1	\$ 300.00	\$ 30.00
2/11/2022	Calendar deadline	0.1	\$ 300.00	\$ 30.00
2/15/2022	Correspondence with client regarding discovery	0.1	\$ 300.00	\$ 30.00
2/17/2022	Calendar deadline	0.1	\$ 300.00	\$ 30.00

2/18/2022	Calendar deadline	0.1	\$ 300.00	\$ 30.00
2/21/2022	Attention to discovery	0.2	\$ 300.00	\$ 60.00
2/22/2022	Correspondence with opposing counsel	0.1	\$ 300.00	\$ 30.00
3/2/2022	Review calendared conference and prepare for same	0.3	\$ 300.00	\$ 90.00
3/3/2022	Review Order modifying conference	0.1	\$ 300.00	\$ 30.00
3/7/2022	Correspondence with opposing counsel	0.1	\$ 300.00	\$ 30.00
3/8/2022	Review calendared conference and prepare for same	0.2	\$ 300.00	\$ 60.00
3/9/2022	Draft mediation statement; attend status conference	1.2	\$ 300.00	\$ 360.00
3/10/2022	Review letter from opposing counsel regarding mediation	0.1	\$ 300.00	\$ 30.00
3/15/2022	Calendar deadline	0.1	\$ 300.00	\$ 30.00
3/14/2022	Review ECF bounce regarding status conference	0.1	\$ 300.00	\$ 30.00
3/20/2022	Correspondence with opposing counsel	0.1	\$ 300.00	\$ 30.00
3/21/2022	Calendar deadline; correspondence with opposing counsel	0.1	\$ 300.00	\$ 30.00
3/26/2022	Correspondence with opposing counsel regarding discovery	0.1	\$ 300.00	\$ 30.00
4/4/2022	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
4/5/2022	Review ECF bounce regarding bankruptcy	0.1	\$ 300.00	\$ 30.00
4/6/2022	Draft joint status report; conduct research regarding bankruptcy	1.1	\$ 300.00	\$ 330.00
4/8/2022	File status report; review ECF bounce from Court with status conference	0.1	\$ 300.00	\$ 30.00
4/11/2022	Correspondence with client regarding discovery	0.1	\$ 300.00	\$ 30.00
4/12/2022	Correspondence with client regarding discovery	0.1	\$ 300.00	\$ 30.00
4/17/2022	Conference with client regarding discovery; draft responses to discovery	1.5	\$ 300.00	\$ 450.00
4/18/2022	Correspondence with client regarding discovery; draft deficiency letter	0.8	\$ 300.00	\$ 240.00
4/19/2022	Correspondence with opposing counsel regarding discovery; calendar deadline	0.1	\$ 300.00	\$ 30.00
4/22/2022	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
4/29/2022	Correspondence with opposing counsel regarding discovery	0.1	\$ 300.00	\$ 30.00
5/5/2022	Review calendared conference and prepare for same	0.2	\$ 300.00	\$ 60.00
5/18/2022	Correspondence with client regarding discovery; draft supplemental deficiency letter; draft motion for leave to amend and amended complaint	2.2	\$ 300.00	\$ 660.00
5/20/2022	File letter motion for leave to amend with second amended complaint; review ECF bounce adjourning status conference; calendar deadlines	0.2	\$ 300.00	\$ 60.00
5/25/2022	Correspondence with opposing counsel regarding discovery	0.1	\$ 300.00	\$ 30.00
6/2/2022	Review ECF bounce with USDJ reassignment	0.1	\$ 300.00	\$ 30.00
6/3/2022	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
6/8/2022	Review discovery	0.2	\$ 300.00	\$ 60.00
6/10/2022	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
6/14/2022	Review opposing counsel's response in opposition to motion for leave to amend pleadings	0.2	\$ 300.00	\$ 60.00
6/17/2022	Draft reply letter in further support of letter motion for leave to amend pleadings; correspondence with client regarding case	1.2	\$ 300.00	\$ 360.00
8/19/2022	Review ECF bounce from Court with USMJ Order regarding motion for leave to amend pleadings; calendar deadline	0.1	\$ 300.00	\$ 30.00
8/30/2022	Conference with opposing counsel regarding settlement	0.5	\$ 300.00	\$ 150.00
9/2/2022	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
9/4/2022	Prepare motion for leave to amend	0.5	\$ 300.00	\$ 150.00
9/7/2022	Continue drafting motion for leave to amend	0.5	\$ 300.00	\$ 150.00
9/9/2022	Finalize and file motion for leave to amend	1.1	\$ 300.00	\$ 330.00
10/1/2022	Review ECF bounce from opposing counsel with opposition papers	0.3	\$ 300.00	\$ 90.00
10/7/2022	Draft reply memorandum of law in further support of motion for leave to amend	1.2	\$ 300.00	\$ 360.00

5/1/2023	Review ECF bounce from Court with USMJ Order granting motion for leave to amend pleadings; calendar deadline	0.5	\$ 300.00	\$ 150.00
5/4/2023	File second amended complaint; prepare and file summons for Avoyants	0.3	\$ 300.00	\$ 90.00
5/16/2023	Calendar deadline; file proof of service on Avoyants	0.1	\$ 300.00	\$ 30.00
5/24/2023	Correspondence with opposing counsel; review ECF bounce from opposing counsel with request for pre-motion conference; calendar deadline	0.1	\$ 300.00	\$ 30.00
5/29/2023	Draft letter response in opposition to pre-motion conference request	0.7	\$ 300.00	\$ 210.00
5/30/2023	File letter response in opposition to pre-motion conference request	0.1	\$ 300.00	\$ 30.00
5/31/2023	Review ECF bounce from Court with USMJ Order regarding third amended complaint; calendar deadlines	0.1	\$ 300.00	\$ 30.00
6/2/2023	Review calendared conference and prepare for same	0.2	\$ 300.00	\$ 60.00
6/5/2023	Prepare and file third amended complaint	0.5	\$ 300.00	\$ 150.00
6/9/2023	Conduct status conference	0.5	\$ 300.00	\$ 150.00
6/11/2023	Review discovery; correspondence with process server	0.5	\$ 300.00	\$ 150.00
6/12/2023	Review USMJ Order; calendar deadlines	0.1	\$ 300.00	\$ 30.00
6/18/2023	Correspondence with Avoyants regarding discovery; calendar deadline	0.1	\$ 300.00	\$ 30.00
6/19/2023	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
6/26/2023	Correspondence with process server; calendar deadline; file proof of service	0.2	\$ 300.00	\$ 60.00
6/28/2023	Review answer filed by Defendants	0.1	\$ 300.00	\$ 30.00
7/10/2023	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
7/11/2023	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
7/12/2023	Correspondence with opposing counsel regarding discovery	0.1	\$ 300.00	\$ 30.00
7/13/2023	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
7/20/2023	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
7/23/2023	Draft and file request for certificate of default; correspondence with opposing counsel regarding discovery; draft discovery responses	0.8	\$ 300.00	\$ 240.00
7/25/2023	Review ECF bounce from Clerk with denial of request for certificate of default	0.1	\$ 300.00	\$ 30.00
7/29/2023	Review answer filed by Defendants	0.1	\$ 300.00	\$ 30.00
8/1/2023	Correspondence with opposing counsel regarding discovery	0.1	\$ 300.00	\$ 30.00
8/3/2023	Correspondence with opposing counsel regarding discovery	0.1	\$ 300.00	\$ 30.00
8/6/2023	Draft affidavit in support of request for certificate of default; correspondence with client regarding same	0.8	\$ 300.00	\$ 240.00
8/7/2023	Correspondence with opposing counsel regarding conference	0.1	\$ 300.00	\$ 30.00
8/8/2023	Conference with opposing counsel regarding case; correspondence with client regarding default application	0.3	\$ 300.00	\$ 90.00
8/9/2023	Correspondence with client regarding default application; correspondence with opposing counsel regarding conference	0.2	\$ 300.00	\$ 60.00
8/13/2023	Correspondence with opposing counsel regarding discovery; revise affidavit for default application; correspondence with client regarding same	0.4	\$ 300.00	\$ 120.00
8/14/2023	Draft letter motion to compel DNA sample; correspondence with client regarding same	2.5	\$ 300.00	\$ 750.00
8/15/2023	Correspondence and conference with opposing counsel regarding case; correspondence with client regarding default application	0.1	\$ 300.00	\$ 30.00
8/16/2023	Finalize declaration in support; correspondence with client regarding same	0.4	\$ 300.00	\$ 120.00
8/22/2023	Revise and refile request for certificate of default	0.6	\$ 300.00	\$ 180.00
8/23/2023	Review ECF bounce from clerk with certificate of default	0.1	\$ 300.00	\$ 30.00
8/25/2023	Correspondence with Avoyants regarding certificate of default; file affidavit of service; review ECF bounce from Court with USMJ Order	0.2	\$ 300.00	\$ 60.00
8/29/2023	Correspondence with opposing counsel regarding discovery	0.1	\$ 300.00	\$ 30.00
9/1/2023	Review ECF bounce from Court regarding motion to compel	0.1	\$ 300.00	\$ 30.00
9/6/2023	Correspondence with opposing counsel regarding bankruptcy; review ECF bounce regarding same	0.1	\$ 300.00	\$ 30.00
9/7/2023	Calendar deadlines and conference; correspondence with opposing counsel regarding discovery	0.2	\$ 300.00	\$ 60.00
9/8/2023	Review ECF bounce from opposing counsel with opposition papers	0.1	\$ 300.00	\$ 30.00
9/21/2023	Calendar deadline	0.1	\$ 300.00	\$ 30.00

9/26/2023	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
9/28/2023	Draft and file reply letter in further support of letter motion to compel DNA	1.6	\$ 300.00	\$ 480.00
10/29/2023	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
11/5/2023	Draft motion for default judgment	1.9	\$ 300.00	\$ 570.00
11/10/2023	Review ECF bounce from opposing counsel with motion for leave to withdraw	0.1	\$ 300.00	\$ 30.00
11/29/2023	Review ECF bounce from Court regarding motion for leave to withdraw	0.1	\$ 300.00	\$ 30.00
12/10/2023	Review calendared deadline	0.1	\$ 300.00	\$ 30.00
12/11/2023	Review calendared conference and prepare for same	0.2	\$ 300.00	\$ 60.00
12/15/2023	Review ECF bounce from opposing counsel with letter motion to adjourn	0.1	\$ 300.00	\$ 30.00
12/18/2023	Review ECF bounce from Court with USMJ Order granting letter motion to adjourn	0.1	\$ 300.00	\$ 30.00
12/19/2023	Review ECF bounce from Court with USMJ Order granting letter motion to withdraw	0.1	\$ 300.00	\$ 30.00
12/28/2023	Review ECF bounce from opposing counsel with stipulation of dismissal	0.1	\$ 300.00	\$ 30.00
1/2/2024	Review ECF bounce from Court with USDJ Order regarding corporate defendant without counsel	0.1	\$ 300.00	\$ 30.00
1/8/2024	Review ECF bounce from opposing counsel with stipulation of dismissal	0.1	\$ 300.00	\$ 30.00
3/25/2024	Review ECF bounce from Court with USMJ Order on motion for default; calendar virtual inquest	0.1	\$ 300.00	\$ 30.00
TOTALS		54		\$ 16,200.00